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INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman

Arizona Corporation Commission

DOCKETED

AZ CORP COMMISSION
DOCUMENT CONTROLJIM IRVIN
Commissioner

FEB 21 2002

MARC SPITZER
Commissioner

DOCKETED BY

*ms*IN THE MATTER OF THE GENERIC
PROCEEDINGS CONCERNING ELECTRIC
RESTRUCTURING.

DOCKET NO. E-00000A-02-0051

ISSUES IN THE MATTER OF TUCSON ELECTRIC
POWER COMPANY'S APPLICATION FOR A
VARIANCE OF CERTAIN ELECTRIC COMPETITION
RULES COMPLIANCE DATES.

DOCKET NO. E-01933A-02-0069

IN THE MATTER OF THE MATTER OF THE
GENERIC PROCEEDING CONCERNING THE
ARIZONA INDEPENDENT SCHEDULING
ADMINISTRATOR.

DOCKET NO. E-00000A-01-0630

APPLICATION FOR LEAVE TO
INTERVENE

Pursuant to A.A.C. R14-3-105, Arizona Public Service Company ("APS" or the "Company") hereby petitions the Arizona Corporation Commission ("Commission") for leave to intervene in the above captioned proceedings.¹ This motion is supported by the following facts and information:

1. As a result of the Commission's February 8, 2002 Order consolidating the Company's request for a variance to the requirements of A.A.C. R14-2-1606 (B) and approval of a proposed purchase power agreement between APS and Pinnacle West Capital Corporation (Docket No. E-0345A-01-0822) with Docket Nos. E-00000A-02-0051, E-00000A-01-0630, E-01933A-02-0069 and E-01933A-98-0471, the Company may be directly and substantially

¹ As noted below, the instant consolidated docket also includes Commission Docket Nos. E-01345A-01-0822 and E-01933A-01-98-0471. As the applicant in the former, APS is already a party. As to the latter, that docket has nothing to do with APS or the Electric Competition Rules, and the Company does not seek intervention therein.

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affected by the decision of the Commission in the above consolidated proceedings.

2. APS' interests in the above three proceedings are not adequately and sufficiently represented by any party currently involved in these matters.

3. The granting of intervenor status to APS will not in delay the proceedings or cause the issues to be unduly broadened.

4. Copies of all notices, exhibits, pleadings and orders in these proceedings should be sent to:

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5. APS is willing to accept electronic service of all documents.

WHEREFORE, in view of the foregoing, APS respectfully requests that the Commission grant the Company's request for leave to intervene in the above-captioned proceedings, and that APS be accorded the full status of an intervenor under the Commission's rules and regulations.

RESPECTFULLY SUBMITTED this 21st day of February, 2002.

SNELL & WILMER

By



Thomas L. Mumaw
Jeffrey B. Guldner
Faraz Sanei

Attorneys for the Arizona Public Service Company

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ORIGINAL and 14 copies filed this
21st day of February, 2002, with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, AZ

COPY of the foregoing mailed, e-mailed, faxed or hand-delivered
this 21st day of February, 2002, to:

All parties of record


Sharon R. Madden

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